

1 KEKER & VAN NEST LLP
JOHN W. KEKER - # 49092
2 jkeker@kvn.com
JAN NIELSEN LITTLE - # 100029
3 jlittle@kvn.com
BROOK DOOLEY - # 230423
4 bdooley@kvn.com
NICHOLAS D. MARAIS - # 277846
5 nmarais@kvn.com
633 Battery Street
6 San Francisco, CA 94111-1809
Telephone: 415 391 5400
7 Facsimile: 415 397 7188

8 Attorneys for Proposed Intervenor
SUSHOVAN HUSSAIN

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 IN RE HEWLETT PACKARD COMPANY
13 SHAREHOLDER DERIVATIVE
14 LITIGATION.

Master File No. 3:12-cv-6003-CRB

**PROPOSED INTERVENOR SUSHOVAN
HUSSAIN'S NOTICE OF RENEWED
MOTION TO INTERVENE**

Date: April 3, 2015
Time: 10:00 a.m.
Dept.: Courtroom 6, 17th Floor
Judge: Hon. Charles R. Breyer

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19 THIS DOCUMENT RELATES TO:
20 ALL ACTIONS
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TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, on April 3, 2015 at 10:00 a.m., or at such other date and time as counsel may be heard, Proposed Intervenor Sushovan Hussain will renew his motion to intervene in *In re Hewlett-Packard Company Shareholder Derivative Litigation*, Master File No. C-12-06003-CRB, as a matter of right under Federal Rule of Civil Procedure 24(a)(2), or, in the alternative, by the Court's permission under Federal Rule of Civil Procedure 24(b)(1)(B).

Mr. Hussain's motion has been fully briefed since August 11, 2014. *See* Dkts. 160 (Hussain Motion), 165 (HP's Opposition), 169 (Plaintiff's Opposition), 170 (Hussain Reply). Although Mr. Hussain's motion to intervene was initially mooted by the Court's denial of the *third* proposed settlement, it has been put at issue again by the parties' continued efforts—their *fourth* attempt—to settle this case by stripping Mr. Hussain of his legal rights. When Mr. Hussain responded to the latest settlement proposal, as directed by this Court, he specifically renewed his motion to intervene, requested that this Court grant that motion, and explained that his detailed requests for relief had been laid out in previous filings. Dkt. 293 at 9. In response, HP acknowledged that Mr. Hussain “has renewed his motion to intervene in order to challenge the bar order....” Dkt. 304 at iv.

Now, in an abundance of caution, Mr. Hussain files this notice to clarify that:

- Mr. Hussain's renewed motion to intervene is based on those grounds set forth with particularity in his prior submissions (*i.e.*, Dkts. 160, 170, 209, 222–23, 246), as well as the response he filed earlier this month (*i.e.*, Dkt. 293).¹
- Mr. Hussain renews his motion—and continues to seek—to intervene in this action to challenge the parties' proposed “complete bar order” and to request the relief set out in his prior briefs. *See, e.g.*, Dkt. 209 at 13, Dkt. 222 at 15; and
- Mr. Hussain's counsel anticipates appearing before this Court on April 3, or any other date set aside to hear objections to the parties' latest settlement proposal, but

¹ The parties have had every opportunity to respond to Mr. Hussain's motion—and have done so on many occasions. *See, e.g.*, Dkts. 165 (HP Opp. to Hussain Mot. to Intervene); 169 (Pl.'s Opp.) 208 (Pl.'s Supp. Br.); 210 (HP's Supp. Br.); 221 (Pl.'s Reply); 224 (HP's Reply); 259 (HP's Reply); 303 (Pl.'s Reply ISO Third Am. Settlement); 304 (HP's Reply); 305 (Directors' Reply).

1 is willing to be heard at the Court's convenience, including on March 20, 2015, the
2 date set aside by the Court for hearing on pending motions filed by Mr. Copeland
3 (Dkts. 269, 276), and Ms. Steinberg and Mr. Vogel (Dkt. 271).
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5 Dated: February 24, 2015

KEKER & VAN NEST LLP

7 By: /s/ John W. Keker

8 JOHN W. KEKER
9 JAN NIELSEN LITTLE
10 BROOK DOOLEY
11 NIC MARAIS

12 Attorneys for Proposed Intervenor
13 SUSHOVAN HUSSAIN
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